

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

DITECH FINANCIAL LLC,

Plaintiff

v.

BP FISHER LAW GROUP, LLP, *et al.*,

Defendants

CIVIL ACTION NO. \_\_\_\_\_

TDC 18 CV 3332

**DECLARATION OF LAURI E. CLEARY IN SUPPORT OF  
DEFENDANT PLUTOS SAMA, LLC'S NOTICE OF REMOVAL**

I, Lauri E. Cleary, being over the age of eighteen, declare as follows:

1. I am a principal attorney in the law firm of Lerch, Early & Brewer, Chtd., and I represent Defendant Plutos Sama, LLC ("Plutos") in the above-captioned matter. I make this declaration in support of Plutos' Notice of Removal. Pursuant to 28 U.S.C. § 1446(a), the Notice of Removal is being filed together with the attached copies of "all process, pleadings, and orders served" on Plutos in *Ditech Financial, LLC v. BP Fisher Law Group, LLP, et al.*, Case No. CAL18-39907, from the Circuit Court for Prince George's County, Maryland ("the Maryland Action"). Pursuant to Local Rule 103(5)(a), within thirty days, Plutos will file true and legible copies of all other documents then on file in the state court, together with a certification from counsel that all filings in the state court action have been filed in the United States District Court.
2. Attached hereto as **Exhibit A** is a true and correct copy of the current Circuit Court for Prince George's County docket sheet in the Maryland Action.
3. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's Complaint, Docket Entry 1, filed on October 26, 2018 in the Maryland Action.

4. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction, Docket Entry 2, filed on October 26, 2018 in the Maryland Action with Plaintiff's initial pleading.

5. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff's Memorandum in Support of its Motion for Temporary Restraining Order and Preliminary Injunction filed on October 26, 2018 in the Maryland Action with Plaintiff's initial pleading.

6. Attached hereto as **Exhibit E** is a true and correct copy of Pluto's Notice of Filing of Notice of Removal, which is being filed in the Circuit Court for Prince George's County.


I DECLARE UNDER PENALTY OF PERJURY THAT  
THE FOREGOING IS TRUE AND CORRECT.

Executed on October 29, 2018

  
Lauri E. Cleary

Respectfully submitted,

LERCH, EARLY & BREWER, CHARTERED

By: 

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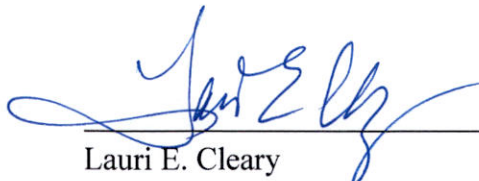
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*Counsel for Plutos Sama, LLC*

Dated: October 29, 2018

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of October, 2018, a copy of the foregoing was delivered by hand to: T. Sky Woodward, Andrew J. Narod, D. Brian O'Dell, BRADLEY ARANT BOULT CUMMINGS LLP, 1615 L Street NW, Suite 1350, Washington, D.C. 20036, *Counsel for Ditech Financial LLC.*

  
Lauri E. Cleary